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Attorneys for Defendants
SHAC, LLC d/b/a SAPPHIRE
GENTLEMEN'S CLUB; and SHAC MT, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CIELO JEAN "CJ" GIBSON, EMMA GLOVER,
JULIANNE KLAREN, LINA POSADA,
MELANIE IGLESIAS, SANDRA VALENCIA,
and VIDA GUERRA,

Plaintiffs,

SHAC, LLC d/b/a SAPPHIRE GENTLEMEN'S CLUB; SHAC MT, LLC, EVAN ZAPPOLA d/b/a VEGAS VIP KING,

Defendants.

Case No. 2:21-CV-01160-JCM-VCF

**STIPULATION TO EXTEND
DEADLINE FOR RESPONSE TO FIRST
AMENDED COMPLAINT**

(First Request)

Pursuant to LR IA 6-1, Plaintiffs Cielo Jean “CJ” Gibson, Emma Glover, Julianne Klaren, Lina Posada, Melanie Iglesias, Sandra Valencia, and Vida Guerra (collectively, “Plaintiffs”), by and through their counsel, and Defendants SHAC, LLC d/b/a Sapphire Gentlemen’s Club and SHAC MT, LLC (together, the “SHAC Parties”), by and through their counsel, stipulate and agree as follows:

1. On June 17, 2021, Plaintiffs filed their Complaint (ECF No. 1);
2. On July 13, 2021, the SHAC Parties (through their counsel) executed Waivers of Service of Summons forms pursuant to Fed. R. Civ. P. 4(d) (ECF Nos. 5-6);
 3. On November 12, 2021, Plaintiffs filed their First Amended Complaint (ECF No. 11), adding Evan Zappola d/b/a Vegas VIP King as an additional Defendant;
 4. Plaintiffs are in the process of attempting service of the Summons and First Amended Complaint on Mr. Zappola;

1 5. Due to scheduling conflicts for the SHAC Parties' counsel and the upcoming holiday,
2 the time for the SHAC Parties to respond to the First Amended Complaint shall be extended from
3 November 29, 2021, to December 13, 2021; and

4 6. This is the first stipulation for an extension of time for the SHAC Parties to respond
5 to the First Amended Complaint, and is sought in good faith and not for purposes of delay.

6 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

7 DATED this 29th day of November, 2021.

8 ALVERSON TAYLOR & SANDERS

9 By: /s/ David M. Sexton
10 KURT R. BONDS (Nv. Bar No. 6228)
11 DAVID M. SEXTON (Nv. Bar No. 14951)
12 6605 Grand Montecito Pkwy, Ste. 200
13 Las Vegas, NV 89149

14 *Attorneys for Plaintiffs*

15 DATED this 29th day of November, 2021.

16 BAILEY♦KENNEDY

17 By: /s/ Joshua P. Gilmore
18 JOSHUA P. GILMORE

19 *Attorneys for Defendants, SHAC, LLC*
20 d/b/a SAPPHIRE GENTLEMEN'S
21 CLUB; and SHAC MT, LLC

22 IT IS SO ORDERED.



23 UNITED STATES MAGISTRATE JUDGE

24 11-29-2021

25 DATED: _____